






Industry Issues with Implementing CGID

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Topical Summary

- CGD Guidance
- Changing Landscape
- Impact of revised/new regulations
- Opportunities to collaborate



Commercial Grade Dedication Guidance

- General guidance on how to perform Commercial Grade Dedication (CGD) is in EPRI NP-5652, NQA-1, and various NRC Documents (Part 21, GL 89-02, GL 91-05, etc.)
- Utilities have adopted the elements of EPRI NP-5652 and the above referenced documents into their internal procedures on how to perform CGD
 - Some vendors are also using this as a guidance document for performing CGD



Commercial Grade Dedication Guidance

- EPRI NP-5652 has recently been made available to vendors (over the past 3 years) so they can see what the 4 methods are and how to use them – with some examples

- Are vendors aware of this and has this guidance been incorporated into their procedures?
- If not, what are they using to ensure these activities are performed correctly?

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Changing Landscape

- A lot of the vendors from the 1970s to 1990s are no longer in the business – their product lines either don't exist anymore or have been sold (some multiple times) – historical data is lost in some of these transactions or not readily available (hard copy versus electronic)

- This is resulting in utilities having to deal with increased obsolescence issues and has greatly increased the need to use CGD

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Changing Landscape

- Plant performance has greatly improved so turnaround times for parts needs are very short

- Parts availability or timely availability has resulted in the expanded use of CGD

- When a quick turnaround is needed, are we communicating the proper technical and quality information to the vendor, are they aware of the end-use?

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Changing Landscape (cont.)

- For utilities and vendors, as new personnel come in, they need to be properly trained on how to perform a CGD effectively
- Some dedication considerations that need to be accounted for
 - What is the safety function(s) of the item being dedicated – depend on where it is being used?
 - What are its failure modes and effects – important to know this based upon its field applications?
 - What are its critical characteristics for acceptance – this is based on input from the above two questions?

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Changing Landscape (cont.)

- Training considerations:
 - Where are they getting the proper training – internally or externally?
 - If externally – are they getting the correct training (from someone that has done dedication or a low cost provider that may not fully understand the CGD process)?

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Impact of Revised / New Regulations

- Utilities are familiar with current regulations and verbiage
 - It is incorporated into our internal procedures & work processes.
- Revised or new regulation would require word-by-word comparison to ensure understanding and **verbatim compliance**, as even the slightest change of verbiage can have potential for significant impact
 - Processes and procedures would need to be revised
 - Pre-established Codes for Purchase Orders and Contracts would need to be revised
 - Internal Training would need to be revised
 - Vendor oversight would be significantly increased – as their programs would need to be re-audited to ensure proper compliance
- Some or all of the above impacts would be the same for our Vendors

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Opportunities to Collaborate

- Work jointly to define the gaps – from a regulatory and industry perspective - this worked well with the CGD guidance in NRC IP-43004 and NQA-1
- Determine how best to close these gaps – consolidation of existing guidance documents, new guidance document, clarification of rules, accreditation of CGD Training, etc.
- Define what is considered as acceptable software dedication (whether it is called CGD or V&V)

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